CHAD A. READLER Acting Assistant Attorney General 2 WILLIAM C. PEACHEY Director, District Court Section 3 Office of Immigration Litigation JEFFREY S. ROBINS Assistant Director 5 JULIAN M. KURZ Trial Attorney, District Court Section 6 Office of Immigration Litigation U.S. Department of Justice P.O. Box 868, Ben Franklin Station Washington, DC 20044 (202) 616-4962; (202) 305-7000 (fax) julian.m.kurz@usdoj.gov Counsel for Respondents 10 UNITED STATES DISTRICT COURT 11 NORTHERN DISTRICT OF CALIFORNIA 12 SAN FRANCISCO DIVISION 13 ASTRID HURTADO-ROMERO, 14 Petitioner, No. 3:18-CV-1685-EMC STIPULATION TO EXTEND RESPONSE AND 15 V. **REPLY DEADLINES RE: PETITIONER'S** JEFF SESSIONS, et al., 16 MOTION FOR ATTORNEY'S FEES Respondents. 17 18 19 The parties respectfully request that the Court extend the response and reply deadlines with 20 respect to Petitioner's Motion for Attorney's Fees (ECF No. 16). At present, the response deadline falls 21 on August 6, 2018, and the reply deadline falls on August 13, 2018. The parties request that the Court 22 extend each deadline by one week, such that the response deadline will fall on August 13, and the reply 23 deadline will fall on August 20. 24 The basis for this request is that Respondents' counsel needs additional time to research and draft 25 a thorough response; in other cases, he is responsible for drafting and filing two lengthy briefs within 26 the next week. Petitioner's counsel has kindly agreed to this extension request. 27

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Dated: July 31, 2018 1 Respectfully submitted, 2 CHAD A. READLER /s/ Eliyahu Kaplunovsky Acting Assistant Attorney General ELIYAHU KAPLUNOVSKY (SBN # 299178) 3 Civil Division 1669-2 Hollenbeck Ave. #211 Sunnyvale, CA 94087 4 (408) 309 4506 WILLIAM C. PEACHEY yk@yulilaw.com 5 Director, District Court Section Office of Immigration Ligation 6 Counsel for Petitioner JEFFREY S. ROBINS 7 Assistant Director 8 /s/ Julian M. Kurz 9 JULIAN M. KURZ Trial Attorney (NYSBN # 5395934) 10 U.S. Department of Justice, Civil Division Office of Immigration Litigation 11 District Court Section P.O. Box 868. Ben Franklin Station 12 Washington, DC 20044 (202) 616-4962; (202) 305-7000 (fax) 13 julian.m.kurz@usdoj.gov 14 Counsel for Respondents 15 16 17 18 19 20 21 22 23 24 25 26 27

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STIPULATED EXTENSION REQUEST

3:18-CV-1685-EMC

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## [PROPOSED] ORDER

The Court has considered the parties' stipulated request to extend the response and reply deadlines with respect to Petitioner's Motion for Attorney's Fees. The Court hereby GRANTS the request. The response deadline is extended to August 13, 2018, and the reply deadline is extended to August 20, 2018.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: July 31, 2018

